Waste Management
ENVIRONMENTAL QUALITY

PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

MICHAEL SCOTT
Director

Via Electronic Mail – JGuglielmetti@am-truetzschler.com
Via First Class Mail

September 29, 2016

John Guglielmetti
American Trützschler, Inc.
Post Office Box 669228
Charlotte, North Carolina 28266

RE: **American Truetzschler**
12300 Moores Chapel Road
Charlotte, Mecklenburg County, North Carolina
NONCD0001257

Dear Mr. Guglielmetti:

The Inactive Hazardous Sites Branch (IHSB) of the North Carolina Division of Waste Management (Division) has reviewed the August 15, 2016 Phase IV Remedial Investigation Work Plan (Phase IV RI Plan) for the above referenced Site, which was received on August 16, 2016. Based on this review, the IHSB offers the following comments:

General Comments

1) All Phase IV RI assessment activities and subsequent reporting must fully comply with the technical and administrative requirements of the Inactive Hazardous Sites Program's Guidelines for Assessment and Cleanup (*Guidelines*). In addition, the Phase IV RI Plan activities and the subsequent Phase IV Remedial Investigation Report (Phase IV RI Report) must adequately address the appropriate items and comments discussed in this correspondence.

2) Based on available records, the IHSB has compiled the following list of contaminants of concern (COCs) for the Site: Acetone, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, Chloroethane, Chloromethane, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,1-Dichloroethene, cis-1,2-Dichloroethene, trans-1,2-Dichloroethene, 1,2-Dichloropropane, 1,4-Dioxane, Ethylbenzene, Ethylene Dibromide, Methylene Chloride, Tetrachloroethene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, Trichloroethene, Trichlorofluoromethane, Toluene, Vinyl Chloride, and Xylene. Note: this may not be a comprehensive inventory of contaminants present at the Site and the remedial investigation and remedial action are not limited to this list of constituents and compounds. Moreover, the COC list for the Site may be subsequently revised and amended upon the review and consideration of additional data.

Specific Comments

1) The IHSB recommends a modification of the sampling schedule for water-supply wells MW-32, MW-33, and MW-41 as shown in Table 8 of the Phase IV RI Plan from semi-annual to annual. File records indicate that no Volatile Organic Compounds (VOCs) have been previously reported in groundwater from MW-32 and MW-33, and MW-41 is also subject to VOC sampling oversight by the Public Water Section.

2) As proposed in the Phase IV RI Plan, routine monitoring of water-supply wells WSW-35, WSW-36, and WSW-37 for COCs will continue on a semi-annual basis with the next sampling event occurring on or before December 31, 2016. In addition, quarterly sampling of the influent groundwater from recovery well RW-1 for target Volatile Organic Compounds (VOCs) will also continue during the operation of the groundwater recovery system and annual sampling of water-supply well WSW-41 will be conducted on or before January 31, 2017.

3) The IHSB understands the HH2 (WSW-43) water-supply well of the Harbor House Community Public Water System has been offline since June 2013 and the subsequent pilot-test evaluation of select water treatment technologies has been completed. The IHSB also understands that efforts are underway to construct a service line to supply municipal water to the residents of the Harbor House Community. The IHSB requests that you continue to provide informal and periodic updates of the progress of the service line's construction and any substantive event. A complete accounting of all efforts to provide alternative sources of potable water and a detailed summary of construction status and tap installation of the service line will be included in the subsequent Phase IV RI Report.

4) The IHSB understands that an annual groundwater sampling event will be conducted after the construction of the proposed monitor well MW-25. If the Tubing in Screened Interval Method (Low Flow) Method is used to purge monitor wells, the static groundwater level must be measured prior to and during the purging process. Ideally, there should only be a slight and stable drawdown of the water column after pumping begins. During the proposed groundwater sampling event, the IHSB also recommends field measurements of both static and dynamic groundwater elevation to measure the net drawdown (cone of depression) induced by the groundwater recovery system.

5) The IHSB concurs with the abandonment of groundwater monitor or recovery wells threatened or damaged (e.g. MW-2V). Once a suitable replacement well is installed, the abandonment of monitor well MW-7 may also proceed. Professional survey data must exist for any monitor or recovery well prior to abandonment. The IHSB will evaluate additional monitor well abandonments upon the conclusion of remedial activities.

6) Division records suggest monitor wells MW-18, MW-19, MW-20, and MW-21 (which have been previously reported as missing) may be the sampling ports of the Vacuum Vaporizing Well (UVB) that once operated at the Site. Groundwater sampling of the existing UVB ports may be useful in resolving a data gap in the lack of current groundwater conditions in the suspected source area.

7) All groundwater monitor-well installations must fully comply with the construction standards pursuant to Subchapter 2C of Title 15A of the North Carolina Administrative Code (15A NCAC 2C). If you have questions regarding the requirements of 15A NCAC 2C, please contact the Water Quality Regional Operations Section of the Division of Water Resources at (704) 663-1699.

8) The simplified Conceptual Site Model (CSM) will be appropriately revised to include new information that may become available during implementation of the work plan. The CSM is a living document and must continue to propose a reasonable hypothesis of the Site's dynamics while incorporating current and historical data.

Qualifications

The Phase IV RI Plan will be qualified to include the following:

1) The Phase IV RI Plan proposes to collect groundwater samples from monitor wells by using a submersible pump. If the same pump is re-used during groundwater assessment activities, an equipment rinsate blank must be collected during each week of assessment activities. The Phase IV RI Plan will be qualified to include at least one equipment blank to verify adequate field decontamination of sampling equipment. Further information regarding this requirement may be found in the United States Environmental Protection Agency (USEPA) Region 4 Science and Ecosystem Support Division's Operating Procedures SESDPROC-205 and SESDPROC-011 (please refer to the most current version);

2) An assessment gap due was introduced by the destruction of monitor wells MW-3S and MW-3D and the lack of a monitor well screened within current water-table surface near monitor well MW- 7. The Phase IV RI Plan will address the gap in the monitor well network by installing one monitor well (MW-25) adjacent and west of MW-7. The Phase IV RI Plan will be qualified to include a nested well pair at the proposed location of monitor well MW-25. One well will be screened within the current water-table surface and the other will be screened within the transitional aquifer system, preferably, with the bottom of the well screen placed at the bedrock surface. The minimum separation distance from the bottom of the surficial well screen and the top of the transitional well screen must be at least 10 feet.

The Phase IV RI Plan of the American Truetzschler Site is hereby **approved** subject to your acceptance of the two qualifications noted above. Before implementing the work plan, you must notify the IHSB no less than ten (10) working days prior to conducting any related field activity. Based on your estimated schedule, the IHSB understands the proposed Phase IV RI activities will be completed approximately eight weeks and the assessment data gathered will be compiled into a Phase IV RI Report within approximately four weeks. The IHSB anticipates that a **complete Phase IV RI Report will be received on or before January 4, 2017**. For information regarding the elements required for the Phase IV RI Report, please review the *Guidelines.*

Field conditions at this active manufacturing facility may limit mobility and access in the proposed areas of study. In addition, adjustments to the proposed monitor-well construction may be necessary to accommodate the geology encountered. During the implementation of the Phase IV RI Plan, please document all

modifications to the proposed scope and provide a reasonable rationale for any adjustments or changes that are made to the work plan in the subsequent report. For specific assistance during field activities, please contact the IHSB.

We appreciate your participation in this remedial investigation. If you have questions, need more information, or require adjustments to this schedule, please contact me at (704) 663-1699.

Sincerely,

George D. Adams, Engineer
Division of Waste Management, NCDEQ

ec: Michael T. Stanforth
Excel Environmental Associates, PLLC

Shawna Caldwell
Mecklenburg County, LUESA
shawna.caldwell@mecklenburgcountync.gov